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11 *Attorneys for Plaintiff EMULAIT, INC. f/k/a*  
12 *PROXAMAMA, INC.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 EMULAIT, INC. f/k/a PROXAMAMA, INC.,

16 Plaintiff,

17 v.

18 ROEMBKE TURNKEY SOLUTIONS, LLC,  
19 ROEMBKE MFG. & DESIGN, INC., and  
GREGORY J. ROEMBKE,

20 Defendants.  
21

Case No. 2:24-CV-02267-APG-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND  
TO DEFENDANTS' MOTION TO  
DISMISS OR TO TRANSFER**

**(First Request)**

22 Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Plaintiff Emulait, Inc. f/k/a  
23 Proxamama, Inc. ("Plaintiff") and Defendants Roembke Turnkey Solutions, LLC, Roembke Mfg.  
24 & Design, Inc., and Gregory J. Roembke ("Defendants," together with Plaintiff, the "Parties"),  
25 respectfully request that the Court approve this Stipulation to Extend the Deadline to Respond to  
26 Defendants' Motion to Dismiss or to Transfer. This is the Parties' first request.  
27  
28

1 IT IS HEREBY STIPULATED AND AGREED as follows:

2 1. Defendants filed their Motion to Dismiss or to Transfer [ECF Nos. 16 and 17] (the  
3 “Motion”) on January 17, 2025.

4 2. The current deadline for Plaintiff to file its response to Defendants’ Motion is  
5 January 31, 2025.

6 3. Defendants consent to a two-week extension on Plaintiff’s response deadline, as  
7 Defendants had also requested and were granted a two-week extension to file a response to the  
8 Complaint, which the Court approved [ECF No. 15].

9 4. Plaintiff requests the extension to permit sufficient time for Plaintiff and its  
10 employees to locate the documentation necessary to support the declaration it intends to file in  
11 support of its opposition to Defendants’ Motion to Dismiss or to Transfer.

12 5. This request is not intended to cause delay or prejudice any party.

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
14 the Parties that the time for Plaintiff to respond to Defendants’ Motion to Dismiss or to Transfer  
15 be extended to February 11, 2025.

16 DATED this 28th day of January, 2025.

DATED this 28th day of January, 2025.

17 FOX ROTHSCHILD LLP

KAEMPFER CROWELL

18 /s/ Rex D. Garner

/s/ Louis M. Bubala

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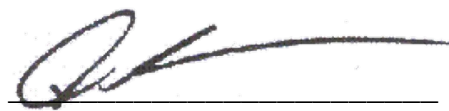
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23 *PROXAMAMA, INC.*

*Attorneys for Defendants ROEMBKE*  
*TURNKEY SOLUTIONS, LLC, ROEMBKE*  
*MFG. & DESIGN, INC., and GREGORY J.*  
*ROEMBKE*

24 IT IS SO ORDERED:

25 Dated: January 29, 2025

26 

27 ANDREW P. GORDON  
28 CHIEF UNITED STATES DISTRICT JUDGE